



**HealthNet Gaston
CODE OF CONDUCT
PURSUANT TO 2 CFR 200.318(c)(1)**

Federal regulations (2 CFR part 200) and HUD's Notices of Funding Availability (NOFA) for discretionary funds require non-Federal entities receiving Federal assistance awards, excluding States, to develop and maintain written standards/codes of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts.

Conflicts of Interest

No employee, officer or agent of HealthNet Gaston shall participate in selection, or in the award or administration of a contract supported by U.S. Federal funds if a conflict of interest would be involved. Such a conflict would arise when (i) the employee, officer, or agent, (ii) any member of his/her immediate family, (iii) his/her partner, or (iv) an organization which employs, or is about to employ, any of the above, has a financial or other interest in the first selected for award.

An employee, officers or agent of HealthNet Gaston shall be careful to ensure that s/he is involved in no apparent or potential violations of this provision.

Gifts

HealthNet Gaston's officers, employees or agents will neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub-agreements. Depending upon the circumstances, exceptions to this provision may be granted only in situations where the financial interest is not substantial or the gift is an unsolicited item of nominal intrinsic value.

An employee, officer or agent of HealthNet Gaston shall be careful to ensure that s/he is involved in no apparent or potential violations of this provision.

Administration

Any employee, officer or agent of the HealthNet Gaston should report violations of this Code of Conduct to HealthNet Gaston's Executive Director, and/or Board Chairperson. There will be no retaliation against any party who makes a good faith complaint concerning violations of this Code of Conduct, regardless of whether it is ultimately determined that such violation has in fact



occurred. Nor will there be any retaliation against any party who provides information in the course of an investigation into alleged violations of this Code of Conduct.

All supervisors have a responsibility to be sensitive to and deal with violations of this Code of Conduct. This responsibility includes monitoring all relevant work activities and contacting HealthNet Gaston's Executive Director, and/or Board Chairperson, if it is reasonably believed that a violation of the Code of Conduct has occurred. Any such report shall be investigated regardless of whether a formal complaint has been made.

Discipline

Any employee, officer or agent of the HealthNet Gaston determined to have committed a violation of this Code of Conduct shall be subject to disciplinary action, up to and including termination.

Dissemination

Any employee, officer or agent of the HealthNet Gaston shall be informed of this Code of Conduct when this Code is adopted, and/or when s/he is initially retained by the HealthNet Gaston and on an annual basis thereafter.

*Approved by HealthNet Gaston Board of Directors
July 30, 2019*